

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

VICTORIA LEIGHTON,	§	
Plaintiff	§	Case No.
	§	
v.	§	
	§	
ZWICKER & ASSOCIATES, P.C.,	§	
Defendant	§	

NOTICE OF REMOVAL OF CIVIL ACTION

1. Zwicker & Associates, P.C. (“Zwicker”), a Massachusetts law firm and professional corporation, is a defendant in a civil action originally filed on August 4, 2023 in the Gwinnett County Court, State of Georgia, Case No. 23-C-05542-S4, entitled *Victoria Leighton v. Zwicker and Associates, P.C.*

TIMELINESS OF REMOVAL

2. This removal is timely under 28 U.S.C. § 1446(b). Zwicker & Associates, P.C. was served, through its agent for service of process, with the Complaint of Plaintiff Victoria Leighton on August 7, 2023.

3. Pursuant to 28 U.S.C. § 1446, attached hereto as Exhibit 1 are copies of all process, pleadings and orders served upon Zwicker & Associates, P.C.

BASIS FOR JURISDICTION

4. This Court has original jurisdiction over this action pursuant to 28 U.S.C. § 1331, in that Plaintiff has filed claims against Zwicker & Associates, P.C. alleging violations of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et seq.* and has demanded relief in the form of actual, treble, exemplary, punitive, and statutory damages.

WHEREFORE, Defendant Zwicker & Associates, P.C. files this notice to remove the action captioned *Victoria Leighton v. Zwicker & Associates, P.C.*, Gwinnett County Court, State of Georgia, Case No. 23-C-05542-S4, to this Court.

Respectfully submitted,

ZWICKER & ASSOCIATES, P.C.

By its attorneys,

/s/Keith D. Taylor, Esq.
Keith D. Taylor, Esq. # 141357
Zwicker & Associates, P.C.
3505 Koger Blvd, Suite 125
Duluth, GA 30096
Tel. 678-924-9644, ext. 223
Fax 678-924-9652
ktaylor@zwickerpc.com

Dated: September 6, 2023

CERTIFICATE OF SERVICE

I hereby certify that on September 6, 2023, I caused the foregoing document to be filed electronically with the Clerk of the District Court using the CM/ECF system. I also certify that I have caused a copy of the foregoing to be served via first class mail, postage prepaid on:

Jason Tenenbaum, Esq.
Tenenbaum Law Group, PLLC
1600 Ponce De Leon Blvd.
10th Floor
Coral Gables, FL 33134

I hereby further certify that on September 6, 2023, I caused a copy of the foregoing to be electronically filed with the Gwinnett County Clerk of Court pursuant to 28 U.S.C. § 1446(d).

/s/Keith D. Taylor, Esq.
Keith D. Taylor, Esq.